

## **Deadline 7 - Closing Statement**

I have followed this Examination closely and although I was unable to attend any of the Public Hearings I have made representations prior to and during the Public Examination of this Application for a Development Consent Order.

For reference my documented representations are as follows:-

- RR-2224
- REP1-214 (*N.B. this was intended as two separate representations i.e. Pages 1-2 and 3-7*)
- REP1-215
- REP1-216
- REP3-133 (*N.B. again two separate representations i.e. Page 1 & Pages 2 to 4*)
- REP4-175

Any comments made in this Closing Statement should not detract from my previous representations which I trust have, and will be, fully taken into account by the Examination Authority in producing their report and making their recommendation.

### **1. Planning Inspectorate Process**

The Public Examination concludes on the 29th October 2025 and it my understanding that the Examination Authority will then aim to produce their Report and Recommendation to the Secretary of State within a three month period from the above date i.e. by 29th January 2026. I understand that the Secretary of State would then aim to make a decision within a further three months i.e. by 29th April 2026.

Given that the Examination of these Applications has been conducted in a public and transparent manner it would be reasonable to have assumed that the Report and Recommendation when produced would be published by the Planning Inspectorate so that from a provisional date of say 29th January 2026 the general public and all Interested Parties or other bodies would be able to see the outcome of the Examination.

However, this appears not to be the case.

In July 2025 I emailed the Planning Inspectorate regarding the Morecambe Offshore Wind Farm Generation Assets (a separate Application for a Development Consent Order) asking when, given that the EXA Report and Recommendation had then been submitted to the SoS, this report would be published on the relevant Planning Inspectorate project website.

The email response stated:-

*“The Recommendation Report remains confidential until the Secretary of State (SoS) issues their decision. The report is then published with the decision documents. During the current 3 month decision stage the SoS may decide they need further information from Interested Parties and issue a consultation letter. If this is the case we would issue this consultation letter to gather responses from the relevant Interested Parties”*

Given the public and transparent nature of the Examination for the Generation Assets DCO Application I felt this was unreasonable and submitted to the Planning Inspectorate a Freedom of Information Request arguing, amongst other matters, that delaying publication of the Report until the SoS makes a decision severely limits the ability for any party to have a reasonable length of time to submit a substantive application to the High Court for a Judicial Review as the High Court rules (Rules and Practice Directions - Part 54 - Judicial Review and Statutory Review) require that *“the claim form must be filed not later than six weeks after the grounds to make the claim first arose”* i.e. six weeks from the date that the SoS decision is published.

I also raised this lack of transparency with the Member of Parliament for the Fylde Constituency, Andrew Snowden, who shared my concerns regarding this matter.

In response to my FOI request I received a response from the Planning Inspectorate on 17th August 2025 stating that under the Environmental Information Regulations 2004:-

*"The report is withheld with reference to the exceptions provided for in both Regulation 12(4)(d) and 12(4)(e) of the EIR.*

*In the first instance the report is considered to form part of a wider process of consideration of the application and as such the premature publication of it prior to a decision would be inappropriate. Additionally, it is considered that, at this stage, the report forms an internal communication with the Secretary of State's (SoS) office and as such should not be released on this basis.*

*For both of these exceptions the public interest in disclosure has been considered and it is adjudged that the public interest in upholding the exceptions outweighs the interest in disclosure.*

*Arguments related to the need for a safe space in which the SoS can consider their decision and the distraction from substantive debate of the proposal are cited, as well as any harm release at this stage may have on the overall process".*

I am assuming that a similar Freedom of Information request in respect of the Report and Recommendation that is to be produced for this current Application would receive the same response.

Had there been a further final Open Public Hearing for this Examination, which considering the level of opposition expressed would, I feel, have been appropriate, I would have summarised the above in order to place the procedure on record and to make sure that the very limited timescales for any Judicial Review application were fully understood by all Interested Parties and the General Public. It would also have allowed the Examination Authority to correct or confirm my understanding of the process as described above.

As it is, in the absence of any such forum, I feel it necessary to have the above placed on Public Record in order that there is full awareness of the absence of public visibility of the result of this Examination until the Secretary of State makes their decision and the Examination Authority's Report and Recommendation is then published.

## **2. Public Consultation and Visibility**

In my previous representations I, as have many other respondents, commented on the wholly inadequate statutory public consultation. Even though this appears to have passed the threshold set by the Planning Inspectorate, and thus, by default, accepted by the Examination Authority, the reality of the information and detail provided by the Applicants prior to acceptance of the Application by the Planning Inspectorate was that it was wholly inadequate. There was no iterative process (see especially comments made on this matter by Fylde Borough Council) and what could have been a genuine opportunity to at least attempt to win the support of the local community was totally wasted.

Instead the Applicant's approach, especially as illustrated by the communications to landowners taken by their Land Agents, were indicative of a remote, disinterested and single minded Project Team whose only objective is to get this project over the finishing line.

The Applicants have shied away from doing anything more than the bare minimum of public communication and it can clearly be seen to be in their interests to make public visibility of these large scale, intrusive and destructive civil engineering projects as limited as possible relying instead on volumes of largely impenetrable documentation the understanding of which is far beyond the reasonable capability of the majority of the general public.

I submitted in a previous representation that for projects of this scale and duration it would have been perfectly reasonable to have had a standing exhibition with plans and scaled models showing the route and the works anticipated, including the two predominate features those being the two proposed imposing substations. This of course was never provided and contrasts negatively with the approach taken by the Civil Engineering contractors involved in the replacement of the sea wall defences at Fairhaven, Granny's Bay and Lytham Promenade where an information point was established with staff on hand to answer any queries. The removal and replacement of the existing sea defences in these areas was a major project over a lengthy period and did impact on the locals and visitors ability to use areas of the beach and promenade but this was handled in a constructive manner from the outset.

It should be apparent to the Examination Authority from both the oral hearings and the written representations that there is a widespread lack of awareness of these applications across the local community and, amongst those who are and have been involved in the Examination there is little, if any at all, support for these projects to go ahead.

Long after the consultants, the lawyers, the advisers and the Examination Team have ceased involvement with this Application, and moved on to other matters leaving this as just another item on their resumes, it will be the local community - residents, visitors, commercial and industrial businesses who will have to live with the noise, disruption and destruction imposed by their decisions which can only bring negative impacts to the local community at large.

### **3. Beach Access and Sand Lizards**

In the last set of Issue Specific Hearings the Applicants stated that their temporary use of the Starr Gate slipway access would be limited solely to the launch of light craft towed by a 4x4 vehicle (or similar) purely such that the craft could be used for supervision of the off shore works. This clearly limits any other use of the slipway access by any heavier vehicles which leaves the "Sand Winning" access from Clifton Drive North as the sole means to access the beach for construction purposes.

The EXA will be well aware of what this means in terms of access by HGV and other large plant and equipment which will be needed to support the construction of six Cofferdams and the pull through of cable from offshore to the proposed Transition Joint Bays at Blackpool Airport.

The noise and vibrations from these vehicle and plant movements, the piling required to construct the Cofferdams, and all the ancillary activities taking place in such close proximity to a listed and endangered species in such a sensitive and unique coastal environment will be unduly prejudicial to their habitat and survival. In addition, as I have argued previously, they may lead to offences under the Wildlife and Countryside Act 1981.

Whatever the reassurances given by words on paper the reality is that once contractors are on site they cannot be closely supervised at all times and that short cuts and mistakes are highly probable.

I do not believe that this access is suitable for the purposes proposed and this is yet another reason why the proposed route and construction works are wholly inappropriate and should not be recommended for approval.

### **4. Landfall Works**

I have commented in previous representations that the Applicants are relying wholly on trenchless excavation techniques to drill the six underground pipeline routes from the Transition Joint Bays at Blackpool Airport to the Pipe Exit Points at the six Cofferdams on the beach and foreshore.

I have repeatedly asked what their contingency is if one or all of these trenchless methods fails with no meaningful answer. At an earlier Hearing one of their own representatives or specialists commented that these trenchless excavations would be “challenging” so it is very difficult to understand what approach would be taken if trenchless excavation failed. Given the sensitive nature of the terrain they are proposing to undermine open cut trenching should not be allowed so with no expressed alternatives available how would the works proceed?

This reliance on trenchless drilling over a significant length without damaging the surface environment or causing harm to the underground geology, stability and water courses with no open cut alternative is a significant risk and is yet another reason why the choice of route is inappropriate and why the EXA Recommendation should be for the DCO Application to be refused.

## **5. National Planning and Energy Policy**

This Application and its Examination are based on existing Planning Policies and historic and existing political approaches to Energy Generation and Transmission.

The basis for existing Planning Policy on these matters is based on historic thinking and assessments which do not now stand up to the same analysis as they may have done when first developed. There is considerable debate and disagreement on there being a “Climate Emergency” or “Crisis” and conflicting opinions on the effects of “Climate Change”. The “Critical Need” is not established.

There is a lack of proven majority public support for continuation of “Clean Energy” generation at any cost. The failure of successive Governments since Electricity privatisation to pursue cohesive stable long term planning for Generation has meant they have simply adopted whatever the contemporary position was e.g. the “Dash for Gas”, the “Climate Emergency”, “Renewable Energy”, “The Green Deal”, “Net Zero” irrespective of the effect on price for industrial, commercial and domestic customers who have been largely failed by a Supply market in which numerous Suppliers have collapsed and which has not lowered prices.

This fragmented approach has led to the massive subsidies of supposed “Clean Energy” projects with CFD Auctions attracting higher and higher £/Mwh prices purely to incentivise developers and with little regard to the ongoing costs to Consumers.

It is really not in the interest of the United Kingdom to continue to approve these “Clean Energy” schemes when they bring no benefit to economic growth and perversely cause high levels of environmental destruction in order to deliver so called “Green” energy.

## **6. Blackpool Airport**

There can be few, if any towns (and yes Blackpool is a town not a city) who have a former International Airport in such close proximity to not only Blackpool but also Lytham St Annes and so well served by public transport routes including trains, trams and buses.

Blackpool Airport is a key strategic asset to the economic development of the Fylde and is seen by some Local Authorities at least as being potentially capable again of hosting commercial International flights with all the accruing benefits, especially to the local hospitality industries, were these to re-occur.

I am therefore personally surprised at the co-operation of the Airport and Blackpool Council with the Applicants given the amount of disruption the construction works will involve and the restrictions on potential use of land should permanent rights be granted.

Future marketing of the Airport to airlines such as easyJet, Ryan Air, Jet 2 , Tui etc. would not in my view be helped by up to 11 years of construction work and the disruption this would involve.

There would be far greater benefit to the economy, both in terms of expenditure and jobs if the Airport was allowed to develop and expand with limited interference, if any, from third parties having only a transient presence and economic benefit through their disruptive activities.

## **7. ECHR**

I have in previous submissions argued how this proposed development if it goes ahead violates the rights afforded under Section 8 of the ECHR. I do not wish to repeat the arguments made in that previous representation but maintain this position as previously advocated.

## **8. Concluding Remarks**

The Fylde Coast community at large do not object to Renewable or “Clean” energy Generation where this appropriate and of demonstrable benefit to the local and wider community.

The disruption and environmental destruction these projects would impose on residents, businesses, agriculture and the local economy is neither justified nor necessary. There is only detriment to the local economy and destruction of sensitive environmental locations.

There is widespread opposition, no popular support and the prospect of lasting harm caused by not only the construction works but the legacy of two large imposing substations near to homes and schools. Productive agricultural land will be destroyed and long standing businesses will be unable to continue.

An alternative route exists which has never been properly explored.

Taking all of the representations made into account it should be apparent to the Examination Authority that this Application for a Development Consent Order should not be recommended for approval by the Secretary of State.

As part of my overall Deadline 7 Final Comments Submission please see the attached copy letter originally sent to the Morecambe and Morgan Project Team on 14th November 2023 in response to the Statutory Consultation.

I never received a substantive response to this letter and although some of the contents have been addressed I still feel it is important that the Examination Authority understand these comments in the context of the sparse information available when they were made.

As stated in my representation RR-2224 there was no further iterative process and the Applicants next communication in their "Project Update: Autumn 2024" was that their Application for a Development Consent Order had been accepted by the Planning Inspectorate on 18th November 2024.

The topic of an inadequate consultation has come up numerous times during the examination, both in verbal and written submissions, and despite the Examining Authority's view that this subject could not be addressed in the Examination I believe it should be taken into account, and given due weight, when the Report and Recommendation is written and submitted to the Secretary of State.

[REDACTED]

FREEPOST MORECAMBE AND MORGAN

Dear Sirs

14th November 2023

RESPONSE TO STATUTORY CONSULTATION

This letter, together with my previous letter dated 17th October 2023 and your e-mail dated 27th October 2023 [REDACTED] and 9th November 2023 [REDACTED] is my response to the Statutory Consultation in respect of the Morecambe OffShore Wind Farm proposals.

**1. Privacy**

As stated in my email of the 17th October 2023 in submitting my response to the proposals I do not consent to my personal details, including my name, postal and email addresses to be published in any way or form. My personal information is provided solely for the purposes of communication with the project team and any comments made are to be anonymous if they are included in any publicly accessible format.

**2. Local Concerns**

As well as receiving the information sent by post, most recently the "Morgan and Morecambe Offshore Wind Farms: Transmission Assets Statutory Consultation Brochure October 2023" I also obtained a copy of the "Preliminary Information Report - Non Technical Summary" when I attended the Consultation Event held at St Annes Cricket Club on 3rd November 2023. At this event I had the opportunity to speak to our local MP [REDACTED] as well as some members of your team who were present at this event.

As a resident of the Coastal Dunes Estate, with our property located in the area identified as 7A7B on your Works Plans Sheet 2, we are obviously extremely concerned as to the effect of your proposals to our property, those of the other residents and to the surrounding area. Your plan shows a number of Work Plan Areas within your Transmission Assets red line boundary but the nature of the works to be carried out in each of these is generic in its description with no detail of where cable routes are to be sited or the specific works to be carried out in each of the work areas identified. The only description of works from your Development Consent Order for land areas 7A7B reads:-

"Work No. 7A – Morgan access works including—  
(a) improvement of accesses to the public highway including works to visibility splays  
(b) up to four underground cable circuits in cable ducts  
(c) trenchless installation techniques"

and

"Work No. 7B – Morecambe access works including -  
(a) improvement of accesses to the public highway including works to visibility splays  
(b) up to two underground cable circuits and associated electrical circuit ducts  
(c) trenchless installation techniques"

These generic statements are of no help in understanding specifically how we and other residents will be affected by the proposed works and seem to conflict with the statements made at the Consultation Event where your team stated there would be no compulsory property purchases even though the works descriptions imply significant work in the areas 7A7B.

[REDACTED]

You say that you need an onshore cable construction area with a width of 122 metres. Your plans give no details of exactly where this contiguous area is to be. You will appreciate that the number of documents produced to support these proposals and the amount of information in these make it extremely difficult for members of the public to grasp the scale of the construction works proposed - however it is clear that this will be extremely significant and intrusive. I am not sure how many of those who attended the consultation events appreciated the size and weight of the short section of High Voltage cable on display. The prospect of installing eighteen of these for approximately 25km with a contiguous work area of 120m implies a massive civil engineering project causing significant disruption over a prolonged period of time.

The precise location of the onshore assets where they leave the sea bed is not identified nor the specific infrastructure required at this point of entry. You simply state that these underground transition joint bays (presumably on the landfall area beyond the high tide mark) will be located in the vicinity of Blackpool Airport. This is insufficient information to expect a considered response as it is simply too vague.

You have stated that (4.3.1.2 of the Non Technical Summary) that the cable (surely you mean the eighteen High Voltage cables) is to be installed beneath the sand dunes and the Golf Course using HDD or other trenchless techniques. Even if this is possible how deep will this tunnelling be and what is the effect of vibration or subsidence in what is already a fragile geological area (e.g. the effects of fracking when previously carried out nearby)? Subsidence is an issue in Lytham St Annes and none of the properties in the area proposed for the onshore assets were built to deal with excessive vibration or soil movement. Are you to be responsible, as the Coal Authority is, for compensating any and all of the property owners adversely affected by your works in respect of subsidence or other detrimental effects? You state that you will simply use HDD or other trenchless methodologies but leave open the possibility of open excavation where this is not possible but give no further detail of the impact of this should it be necessary.

I am unconvinced by the statement in 8.9.5.3 of the Non-Technical Summary that effects of noise and vibration, which you admit will occur, may be reduced via the implementation of a bespoke method statement to limit noise and vibration. You give little detail of what or how effective this will be and blandly state with such measures in place no significant effects are predicted. How do you define significant? Where is the evidence showing how such method statements have been used and how effective they have proved? These are almost throwaway statements on the very issues that are likely to cause the most significant upset to residents in all areas of the proposed works.

Where are the details of your contingency plans if open excavation becomes necessary and how do you intend to carry this out given that the Sand Dunes and the Nature Reserves are all, or in part, Sites of Special Scientific Interest? Are you proposing to excavate the Golf Course if tunnelling is not practical. Have the owners or members of this Club agreed to this or even to the tunnelling if that takes place? How will you deal with closures of Clifton Drive North a key route to St Annes on the Sea and Lytham towns? What is the effect on tourism, which both towns depend on economically, if access to these is significantly disturbed? How will you cross the Preston to Blackpool South railway line if open excavation is necessary without closing this and severely impacting on its use by both locals and visitors?

In 8.7.5.4 of the Non-Technical Summary you talk of some requirement to close the beach to public access during the construction phase. This is surely inevitable given the need to build transition joint bays, tunnel under the Sand Dunes, Clifton Road North and the Nature Reserve, Railway Line, Golf Club and or Blackpool Airport, lay and joint eighteen High Voltage cables, carry out remedial works etc. No timescale for the works in this area is given but it is inconceivable that the works will not be significant or lengthy. The attraction of visitors to St Annes on the Sea (you will hopefully appreciate that Lytham St Annes is a



[REDACTED]

generic term covering the town of St Annes-on-the-Sea, Andsell, Fairhaven and the town of Lytham) lies in its traditional seaside appeal encompassing the town, the beach and significantly the extensive and unspoilt sand dunes. Closures of the beach and the intrusive nature of the proposed works will do nothing to help the economy of St Annes nor its essential visitors on whom local businesses depend for their seasonal spending.

In 5.1.6.2 of the Non Technical Summary you state that meetings were held with landowners along the proposed onshore cable export route between February and May 2023. These meetings certainly did not involve ourselves or any other local residents as far as I am aware so it is not clear who and how many landowners you consulted and in respect of exactly what land.

In your documents you point to mitigation for the effects of Electro Magnetic fields but there is no indication of how this will be carried out and how effective it will be. Apart from the possible effects on Navigation Aids for air traffic using Blackpool Airport I understand that Electromagnetic Hypersensitivity exists as a medical condition for some in the population and there is no apparent statement as to how this has been considered.

These vague proposals have caused uncertainty and, for some I am sure, anxiety as all that has been presented for consultation is, in effect, a red line boundary showing the probable area in which the onshore transmission assets are to be located. Anecdotal evidence suggests that house sales have already stalled or fallen through due to the uncertainty of exactly what is being proposed and its specific effect on individual properties.

Even if residents were not proposing to move for any reason the prospect of this major significant and intrusive project hangs over the entire area like dark clouds which, though threatening a storm, linger unpredictably and unsettle the populace below.

### **3. General Comments on the Overall Scheme**

On Page 5 of the Non-Technical Summary you give some background to the apparent "need" for this project. You state it is the "ambition" of the present UK Government to generate 50GW of electricity from offshore wind by 2030 forming part of the pursuit of the "UK Net Zero Target".

You will be aware that a General Election will be held before January 2025. If a week is a long time in politics then over 12 months is an eternity! There has never been any public vote on "Net Zero" - a policy which has seemingly simply been imposed by successive Conservative Governments. The current Prime Minister has already relaxed some of these targets and seems to be aware that the pursuit of this objective should not involve unacceptable additional costs to the general public. I understand the current government has accepted that fossil fuels will remain as a source of primary fuel for power generation for the foreseeable future and to that end has allowed exploration licences to be issued to find future reservoirs of oil and gas for exploitation.

It is quite probable that "Net Zero", and its cost will form a significant part of Party Manifestos as and when they are published and we may see more public discussion on the effect of these policies on business and the general public. Whether or not there is widespread support for "Net Zero" when it is fully defined and publicly debated remains to be seen in my opinion.

Although I have not had the time to fully research the amount of wind power currently connected provisional figures I retrieved indicated approximately 30GW of generating capacity by both onshore and offshore wind powered generation combined. I also believe that there already consents given for more wind power to be established off the shore of Scotland which will add to whatever the true overall wind powered generating capacity is.

[REDACTED]

Of course the wind does not always blow but when it does one report states, "According to research, a wind turbine produces at or above its average rate around 40% of the time, meaning it produces little to no power 60% of the time due to various reasons. The average capacity factor of a wind turbine over one year usually falls between 20% to 30%. " From Science Direct, "Wind turbines are found to lose a percentage of their output per year, with average load factors declining from 28.5% when new to 21% at age 19. " These figures may or may not be true but surely a key factor in assessing the need for this project is the level of generation actually achieved not just the connected generating capacity.

This large and intrusive project is intended to provide some 2GW of generating capacity but the true output over a 35 year lifespan has not been shown as far as I am aware. Neither has the carbon footprint of the project as a whole been given - including the manufacture, transportation, construction and installation of the assets and all the travel, accommodation, printing etc to date and throughout the project by the Project Team and the Contractors involved. This should also include the carbon footprint from decommissioning and recycling assets at the end of their productive life.

Although wind generated electricity is currently a significant component of the energy mix there are other alternatives to just adding more wind powered turbines. Investment in Energy Storage is one example. Great British Nuclear and the prospect of Small Modular Reactors which can be factory built, scaled and sited nearer to the Transmission connection points without the need for the extensive and disruptive impact of this proposed offshore Windfarm project is another. And we have vast amounts of under utilised roof areas where solar panels could potentially be installed leading to localised demand reduction. National Grid are already experimenting with the Demand Flexibility Service and the rush towards Electric Cars is already faltering. Heat Pumps have been shown to be less than effective for the vast majority of our ageing housing stock and we have already had many insulation schemes carried out in the past which leave very little room for further cost effective insulation.


The Domestic and SME Energy Market is all but broken with, I would suggest, the majority of Domestic Customers now on the Standard Variable Tariff and competition having fallen by the wayside. The prospect of loading further costs on Domestic and SME Customers to subsidise a "Green" Agenda is in my view wholly unacceptable.

Very few, if any, would wish to revert to a Coal based Power Generation estate which along with Nuclear formed the basis of our power supply before the "Dash for Gas" in the 1980s. We do, however, currently have a good mix of power generation and at the time of writing this letter the ESO Monthly Electricity Statistics for October showed the overall power generating mix as:-

- Wind - 33.7%
- Gas - 27%
- Nuclear - 13.9%
- Imports - 10.7%
- Biomass - 6%
- Solar - 3.4%
- Hydro - 2.6%
- Coal - 1.6%
- Storage - 1.1%

For the month of June 2023 the statistics were:-

- Gas 36.9%
- Wind 19.2%
- Nuclear 16.7%
- Imports 13.1%
- Solar 9.3%
- Biomass 2.8%

- 
- Hydro 0.6%
  - Storage 0.9%
  - Coal 0.3%

To me this gives an indication of the variability of effective power generation from Wind and these are just but two of the months I sampled for the current year 2023. More investment in battery storage, solar and nuclear would help to give a more balanced selection of available power and to my mind these, together with managed Demand Side Flexibility, are a better use of resources than yet another wind farm when we already have consents given for increasing this form of generation.

#### **4. Conclusions**

Irrespective of the current Governments "Green Agenda" ambitions I do not believe further investment in yet another offshore wind farm is warranted. Apart from the non specific nature of the proposals presented to date I see no need for a 25km x 120m intrusive and disruptive Civil Engineering project the overall carbon footprint of which is unspecified and the cost benefits uncertain.

Taking into account the comments I have made above I wish to register my objection to this scheme and I hope that my views, and those of other respondents, will be fully taken into account.

Yours faithfully



- copy by email to 
- hard copy by post  AND MORGAN" - (please acknowledge receipt)